

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: ALLERGAN BIOCELL
TEXTURED BREAST IMPLANT
PRODUCTS LIABILITY LITIGATION

Case No.: 2:19-md-02921 (BRM)(LDW)
MDL NO. 2921

JUDGE BRIAN R. MARTINOTTI
MAGISTRATE JUDGE LEDA D. WETTRE
SPECIAL MASTER JOSEPH A. DICKSON

THIS DOCUMENT RELATES TO:
ALL CASES

DECLARATION OF MELISSA A. GEIST, ESQ.

Pursuant to 28 U.S.C. § 1746, I, Melissa A. Geist, Esq., declare as follows:

1. I am an attorney licensed to practice in the State of New Jersey and a partner of the law firm Reed Smith LLP, counsel for Defendants Allergan, Inc. and Allergan USA, Inc. (together, “Allergan”) in the above-captioned matter. As such, I am fully familiar with the facts set forth herein.

2. I submit this declaration based on personal knowledge and in support of Allergan’s Surreply to Plaintiffs’ Motion to Quash or for a Protective Order.

3. Attached hereto as **Exhibit A** is a true and correct copy of four redacted Universal Funds Purchase and Assignment Agreements executed by plaintiffs in connection with this litigation.

4. Attached hereto as **Exhibit B** is a true and correct copy of Universal Funds’ website homepage.

5. Attached hereto as **Exhibit C** is a true and correct copy of Universal Funds’ website “About Us” page.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 10, 2025.

/s/ Melissa A. Geist, Esq.
Melissa A. Geist, Esq.